



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 8, 2023

VIA ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Liu et al.*, 21 Cr. 592 (LTS)

Dear Chief Judge Swain:

The Government writes on behalf of the parties to respectfully request an approximately 60-day adjournment of the conference in this case currently scheduled for June 16, 2023. Defendants Mohamed Elmandouh, Henler Datu Tahil, and Noemi Algodon have entered guilty pleas in this case. Two other defendants (Ramon Garcia and Gerard Estrella) are scheduled to enter guilty pleas on June 15, 2023. The Government has extended plea offers to two other defendants. The adjournment requested herein will allow additional time to continue and possibly complete discussions concerning potential pretrial resolutions with these defendants. It will also allow time for the defendants' continued review of the substantial discovery in this case.

If the Court grants this request, the Government further requests that the Court exclude time under the Speedy Trial Act between June 16, 2023, and the new conference date set by the Court. The ends of justice served by granting such an exclusion outweigh the best interest of the public and the defendants in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). An exclusion is warranted to allow additional time for the defendants to review discovery and for the parties to engage in discussions of potential pretrial resolutions of this case. The defendants consent to this request.

The foregoing request for adjournment is granted. The pretrial conference is hereby rescheduled to August 10, 2023, at 11:30 a.m. The Court finds pursuant to 18 U.S.C. § 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from speedy trial computations from today's date through August 10, 2023, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated above. DE#168 resolved. SO ORDERED.

June 9, 2023

/s/ Laura Taylor Swain, Chief USDJ

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

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cc: Defense counsel listed on ECF